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March 5, 2024

Via ECF

Honorable Andrew E. Krause United States Magistrate Judge United State District Court Southern District of New York 300 Quarropas Street Whiteplains, NY 10601

Re:

United States of America v. Eddy Reyes

Mag. No.: 23-07653

Your Honor:

This office represents Eddy Reyes represents Mr. Eddie Reyes who is currently released on pre-trial conditions that include travel restrictions to the Eastern District of New York, Southern District of New York, and District of New Jersey.

With the consent of AUSA Reyhan Watson and USPO Vanessa Perdomo, we write to request that the Court expand Mr. Reyes' geographical travel restrictions to include the Eastern and Middle District of Pennsylvania. Mr. Reyes has an ongoing work interest in vending machine maintenance service, which requires infrequent but regular travel to Pennsylvania.

The Court's consideration of this request is respectfully appreciated. Thank you.

Yours truly,

John Russo

John L. Russo (JR6200)

Cc: AUSA Reyhan Watson (via ECF) USPO Vanessa Perdomo (via Email)

APPLICATION GRANTED

Hon. Judith C. McCarthy
3-14-2024